

THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

LINE CONSTRUCTION BENEFIT FUND, )  
A HEALTH AND WELFARE FUND, )  
) )  
Plaintiff, )  
) )  
v. ) NO. 08C 563  
) )  
WOODWALKERS ELECTRIC, L.L.C., a ) Judge Norgle  
Michigan Limited Liability Corp., ) )  
) )  
Mag. Judge Valdez  
Defendant. )

## MOTION FOR DEFAULT JUDGMENT

NOW COME the Plaintiff and moves this Honorable Court to enter a default judgment on behalf of the Plaintiff and against Defendant on the grounds that the Defendant has failed to answer or otherwise defend the complaint of the Plaintiff, a copy of which is attached as "Exhibit A." Defendant was served on February 21, 2008, as more fully stated on the Affidavit of Service, a copy of which is attached as Exhibit "B."

WHEREFORE, Plaintiff requests the following relief:

1. That default be entered against the Defendant herein, WOODWALKERS ELECTRIC, L.L.C., a Michigan Limited Liability Corporation, and that the complaint filed herein be taken as confessed.
2. That judgment be entered forthwith against the Defendant and in favor of Plaintiff for the period November 1, 2007, through March 31, 2008, in the estimated amount of \$15,000.00, for delinquent contributions and liquidated damages due.

3. That interest and/or liquidated damages be assessed against the Defendant as provided in the Collective Bargaining Agreement and the applicable provisions of the Pension Reform Act.

4. That the Defendant be ordered to comply with and perform according to the terms and conditions of its Collective Bargaining Agreement and the applicable provisions of ERISA as amended.

5. For such other and further relief as the Court may deem just and proper, including reasonable attorney's fees and court costs which are sustained.

/s/ Robert B. Greenberg  
Asher, Gittler, Greenfield & D'Alba, Ltd.  
200 West Jackson Boulevard  
Suite 1900  
Chicago, Illinois 60606  
(312) 263-1500  
IL ARDC#: 01047558

Dated: March 26, 2008